

July 23, 2025

VIA ECF

Hon. Ona T. Wang
U.S. District Judge for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: ***Status of Protective Order,***
In re OpenAI, Inc. Copyright Infringement Litigation, No.1:25-md-03143;
This Document Relates To: All Actions

Pursuant to the Court's July 16, 2025 Order (ECF 344), OpenAI and News Plaintiffs have resolved their dispute regarding the provision under the Protective Order related to AEO-designated documents that may not be shown to the identified News Executives.

Concurrent herewith, the parties have filed an amended Stipulated Protective Order—signed by all parties—that reflects the agreed-upon procedure in Paragraph 24(b).

Sincerely,

/s/ Tiffany Cheung
Tiffany Cheung (*pro hac vice*)
Morrison & Foerster LLP
Counsel for OpenAI Defendants

/s/ Davida Brook
Davida Brook (*pro hac vice*)
Susman Godfrey L.L.P.
Liaison Counsel for News Plaintiffs